

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

MAGGIE RUSSELL

PLAINTIFF

VS.

CIVIL ACTION NO. 1:22-cv-00086-TBM-RPM

MISSISSIPPI GULF COAST COMMUNITY  
COLLEGE through its Board of Trustees  
(in their official and individual capacities) and  
DOES 1-20; inclusive

DEFENDANTS

**UNOPPOSED MOTION TO EXTEND DEADLINES**

COMES NOW Defendant, Mississippi Gulf Coast Community, by and through counsel, and pursuant to the Federal Rules of Civil Procedure, respectfully files this Unopposed Motion to Extend Deadlines, and would show unto the court the following, to-wit:

1.

Plaintiff filed the instant action on April 11, 2022, asserting claims pursuant to Title II of the Americans with Disabilities Act of 1990 and §504 of the Rehabilitation Act of 1973. [1]. Defendant Mississippi Gulf Coast Community College filed its answer on June 27, 2022. [7].

2.

On September 19 2019, a Case Management Conference was held, and a Case Management Order entered by Judge Robert P. Meyers Jr. [11] Pursuant to the Case Management Order the Discovery Deadline is March 8, 2023; the Plaintiff's expert witness disclosure deadline is December 1, 2022; the Defendant's expert witness disclosure deadline is January 4, 2023; and the Motion Deadline is March 23, 2023.

3.

The parties require additional time to conduct discovery in this matter, and respectfully request that these deadlines be extended.

4.

Accordingly, the parties request that the discovery deadline be extended until April 1, 2023; the Plaintiff's expert witness disclosure deadline be extended until January 6, 2023; and the Defendant's expert witness deadline be extended until February 6, 2023; and the Motion Deadline be extended until April 22, 2023.

5.

Defendants have conferred with counsel for the Plaintiff and this motion is unopposed to by the Plaintiff.

6.

That this motion is not being filed for purposes of harassment or delay. Defendant and Plaintiff agree the additional time is needed to conduct discovery and would further show that no harm or prejudice will come to either party by the granting of this Motion.

7.

Due to the nature of this motion, Defendants request that the necessity for a separate memorandum of authorities be waived.

RESPECTFULLY SUBMITTED, this the 1st day of December, 2022.

**MISSISSIPPI GULF COAST COMMUNITY  
COLLEGE, DEFENDANT**

BY: /s/ C. Hunter Salamone  
OF COUNSEL

**CERTIFICATE OF SERVICE**

I, the undersigned, of counsel for Defendant, do hereby certify that on this day, I electronically filed the foregoing *Agreed Motion to Extend Deadlines* with the Clerk of the Court using the CM/ECF system which sent notification to the following counsel of record:

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THIS the 1st day of December, 2022.

/s/ C. Hunter Salamone  
OF COUNSEL

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